

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. PETER CHO,
ET AL.,

Defendants.

Civil Action No.: 2:23– cv-3709

Document Electronically Filed

UNOPPOSED MOTION FOR EXTENSION OF TIME

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USA, Inc.; Salvacion Co., LTD.; Yeong
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Defendants Salvacion, USA, Inc., Salvacion Co., LTD., Yeong Wan Cho (aka Peter Cho) and BioSure Global, Ltd. (the “Moving Defendants”) present the following Unopposed Motion for Extension of Time, as follows:

1. On July 11, 2023, Plaintiff filed its Complaint.
2. On October 25, 2023, the Moving Defendants served a consolidated motion to dismiss pursuant to the Court’s October 4, 2023 Text Order directing consolidation and submission of the Moving Defendants’ motions to dismiss.
3. Plaintiff’s deadline to respond to the consolidated motion to dismiss was originally November 8, 2023.
4. The Court granted Plaintiff’s unopposed motion for extension of time to respond to the consolidated motion to dismiss, extending Plaintiff’s deadline 14 days to November 22, 2023.
5. Plaintiff served its response to the consolidated motion to dismiss on November 22, 2023.
6. The Moving Defendants’ deadline to serve and file a rebuttal brief in support of their consolidated motion to dismiss is currently December 4, 2023.
7. The Moving Defendants respectfully request a 10-day extension of time, or, until December 14, 2023, to serve and file a rebuttal brief in support of their consolidated motion to dismiss.
8. The Moving Defendants have not moved for or obtained similar extensions of time related to the subject motion.
9. Counsel for the Moving Defendants has conferred with Counsel for Plaintiff regarding this motion. Plaintiff does not oppose this motion.

10. This request is not filed for the purpose of delay; no party will be prejudiced by the granting of this motion.

WHEREFORE, the Moving Defendants respectfully request the Court grant this Unopposed Extension to Time and extend their rebuttal deadline to December 14, 2023.

Dated: November 27, 2023

Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

BRADLEY ARANT BOULT CUMMINGS LLP

BY: /s/ Thomas J. White

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that, on this day, the foregoing document was filed with the Clerk of the Court through the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: November 27, 2023

Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

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